

December 20, 2018

Eliot Greenwald, Deputy Chief  
Deputy Chief and Special Assistant to  
Bureau Chief for Telecommunications Relay Services  
Disability Rights Office  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554

**RE: Annual Report of Convo for Continued Certification as a VRS Provider and Request for Confidential Treatment; Structures and Practices of the Video Relay Service Program, Docket No. 10-51**

Dear Mr. Greenwald:

Pursuant to 47 C.F.R. §64.606(g), Convo Communications, LLC ("Convo") hereby submits its annual report as a provider of video relay services ("VRS") eligible for compensation from the Interstate Telecommunications Relay Service ("TRS") Fund and in compliance with §64.606. **Enclosed is a copy of the report in its confidential form and is not for public inspection.**

Pursuant to 47 C.F.R. § 0.459, Convo requests confidential treatment for the company-specific, highly confidential and sensitive proprietary commercial information in the report including its exhibits and thus withholds that information from any public inspection. In addition, the confidential information constitutes highly sensitive commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA").

In support of this request and pursuant to Section 0.459(b) of the Commission's rules, Convo states as follows:

**1. Identification of the specific information for which confidential treatment is sought.**

Convo requests confidential treatment with respect to the confidential information provided in the report and its exhibits.

**2. Identification of the circumstance giving rise to the submission.**

Convo is providing updated corporate proprietary information per the requirements of 47 C.F.R. §64.606(g).

**3. Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.**

The confidential information in Convo's report is highly sensitive commercial information specific to the operational, functional and technological capabilities of Convo. This information is therefore safeguarded from competitors and is not made available to the public.

**4. Explanation of the degree to which the information concerns a service that is subject to competition.**

The confidential information involves Telecommunications Relay Service, a highly competitive market.

**5. Explanation of how disclosure of the information could result in substantial competitive harm.**

Disclosure of the information in the report could cause substantial competitive harm to Convo, because other VRS providers would have access to the company's critical infrastructure, operations and organizational information, and providers could use such information to compete against Convo and undermine the company's position in the VRS marketplace.

**6. Identification of any measures taken to prevent unauthorized disclosure.**

Convo routinely treats the information as highly confidential and exercises significant care to ensure that such information is not disclosed to its competitors or the public.

**7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.**

Convo does not make confidential information such as that in this report available to the public, and this information has not been previously disclosed to third parties.

**8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.**

Convo requests that the information in the report be treated as being confidential on an indefinite basis as it cannot identify a certain date at which this information could be disclosed without causing competitive harm to Convo.

Sincerely,

/s/

Jeff Rosen  
General Counsel

Attachment

cc: [TRSreports@fcc.gov](mailto:TRSreports@fcc.gov) (via electronic delivery)